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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

Reebok International Ltd.	)	
Plaintiff,	)	
v.	)	**Case No.:** 6:07cv144
Nike, Inc.	)	**JURY DEMANDED**
Defendant.	)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Reebok International Ltd. ("Reebok"), upon knowledge with respect to itself, and upon information and belief with respect to all other matters, for its Complaint against Defendant, Nike, Inc. ("Nike"), hereby avers as follows:

THE PARTIES

1. Plaintiff Reebok is a corporation organized under the laws of the State of Massachusetts, having its principal place of business at 1895 J.W. Foster Blvd., Canton, MA 02021.

2. Upon information and belief, defendant Nike is and has been a corporation organized under the laws of the State of Oregon, having a principal place of business at One Bowerman Drive, Beaverton, Oregon 97005-6453.

JURISDICTION AND VENUE

3. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has jurisdiction over the subject matter of this

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action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Nike because Nike regularly conducts business in this district and in the State of Texas and has committed acts of patent infringement and/or has induced or contributed to acts of patent infringement by others in this judicial district.

5. Venue is proper pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b) because defendants have regularly conducted business in this judicial district and have committed and are committing the acts herein described in this venue.

REEBOK'S PATENT IN SUIT

6. On January 30, 2007, United States Patent No. 7,168,190 B1, entitled "Collapsible Shoe," a true and correct copy of which is attached hereto as Exhibit A (the "'190 Patent"), was duly and legally issued to Andrew Gillespie as the named inventor and Reebok as the assignee.

7. Reebok is the lawful owner of all right, title, and interest in and to the '190 Patent, including all rights to recover for past, present, and future infringement.

COUNT ONE

INFRINGEMENT OF THE '190 PATENT

8. Reebok incorporates the allegations set forth in paragraphs 1 through 7 as if fully set forth herein.

9. The '190 Patent is valid and enforceable.

10. Upon information and belief, Nike makes, uses, offers to sell, and sells within the United States and/or imports into the United States, products that infringe at least claim 1 of the '190 Patent, including but not limited to, the Nike Men's Free 7.0 trainer, Nike Men's Free 5.0 v2, Nike Men's Free Trail 5.0, Nike Men's Free 5.0, Nike Women's Free 5.0 v2, Nike Women's

Free Flex 4.0 TR, Nike Women's Free 4.0, Nike Women's Free 7.0 Trainer, Nike Women's Free Zen & Now 5.0, Nike Women's Free Trainer 4.0, and Nike Women's Free 5.0 in violation of 35 U.S.C. § 271.

11. Upon information and belief, Nike also contributes to and/or knowingly induces infringement of the '190 Patent in violation of 35 U.S.C. § 271.

12. Upon information and belief, Nike has infringed willfully and intentionally the '190 Patent.

13. Upon information and belief, Nike will continue infringing the '190 Patent unless enjoined by this Court.

14. As a result of Nike's infringement, Reebok has suffered and will continue to suffer damages.

15. Reebok is entitled to recover the damages sustained by Reebok as a result of Nike's wrongful acts in an amount to be proven at trial.

16. Reebok will also continue to suffer additional irreparable harm and impairment of its patent rights in the '190 Patent if Nike is permitted to continue practicing the invention claimed; therefore, Reebok is entitled to an injunction against Nike's further infringement.

PRAYER FOR RELIEF

Reebok respectfully requests this Court to grant the following relief:

A. Declare that Nike has infringed the '190 Patent.

B. Declare that Nike's infringement of the '190 Patent has been willful and deliberate.

C. Enjoin Nike, and its officers, agents, servants, employees, attorneys, all parent, subsidiary, and affiliate corporations or other business entities, and all other persons acting in concert, in participation, or in privity with them, and its successors and assigns from continuing infringement, inducement of infringement, or contributory infringement of the '190 Patent in violation of Reebok's rights under the patent laws, Title 35 United States Code;

D. Award Reebok its damages to be determined at trial for infringement of the '190 Patent, together with prejudgment interest and costs as provided by 35 U.S.C. § 284;

E. That Nike be ordered to pay treble damages pursuant to 35 U.S.C. § 284.

F. That Nike be ordered to pay Reebok's attorney fees pursuant to 35 U.S.C. § 285; and

G. Award Reebok such other and further relief as Reebok may be entitled to, and as the Court may deem just and proper.

JURY DEMAND

In accordance with Rule 38 of the Federal Rules of Civil Procedure, Reebok requests a trial by jury of any issue in this action triable by right before a jury.

Dated: April 3, 2007

Respectfully submitted,

By: ______________________

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